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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

TAYLOR ERIC VAUGHN,

Plaintiff,

vs.

WORKDAY, INC.,

Defendant.

Case No. 3:23-cv-00971-AR

**UNOPPOSED MOTION TO
EXTEND THE DEADLINE TO FILE
AN ANSWER OR RESPONSIVE
PLEADING TO PLAINTIFF'S
COMPLAINT**

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, counsel for Plaintiff, Taylor Eric Vaughn, and counsel for Defendant, Workday, Inc. ("Workday, Inc."), have made a good faith effort to confer regarding the subject matter of this motion, and Plaintiff does not oppose it.

MOTION

Pursuant to Local Rule 16-3, Workday, Inc. moves this Court for an extension of the deadline to file its answer or responsive pleading to the Complaint to and including **Friday, August 11, 2023**.

MEMORANDUM IN SUPPORT

On June 2, 2023, Plaintiff filed his Complaint in the Circuit Court of the State of Oregon for the County of Multnomah (“Multnomah County Circuit Court”). On June 30, 2023, Defendant filed a Notice of Removal to remove this action from the Multnomah County Circuit Court to the United States District Court for the District of Oregon. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), an answer or responsive pleading is due seven days after removal, i.e., July 7, 2023.

In light of the long Fourth of July holiday weekend falling within the time period to prepare and file an answer, and due to scheduled July vacations for several of Workday’s witnesses and legal counsel, Workday requires additional time to gather documents and information to prepare its answer, affirmative defenses, or other responsive pleadings. Counsel for Workday, Inc. has communicated with counsel for Plaintiff, who does not oppose this request for additional time to allow Workday, Inc. to adequately evaluate the claims and allegations before preparing a response. This is Workday, Inc.’s first motion to extend the deadline to file a responsive pleading. It is not made for the purposes of delay and will not impact any other deadlines previously set in this case.

CONCLUSION

WHEREFORE, Defendant Workday, Inc. respectfully requests that this Court grant its Unopposed Motion to Extend the Deadline to File an Answer or Responsive Pleading to Plaintiff’s Complaint and enter an order extending the time to plead to **Friday, August 11, 2023**.

Dated: July 5, 2023

Respectfully submitted,

LITTLER MENDELSON P.C.

/s/ Megan J. Crowhurst

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